



The Gallelli Group, Inc.

**Joe Gallelli
President**

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November 30, 1998

Secretary
Federal Communications Commission
1919 M Street NW
Room 222
Washington, DC
20312

Dear Sir/Madam,

The attached comments in original form with nine copies concerning WT Docket No. 96-86 are submitted to The Federal Communications Commission in accord with the Report and Order. Should you have questions concerning this filing, please contact me.

Sincerely,



Joe Gallelli

Attachments:
Original and 9 copies

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**Before the
Federal Communications Commission
Washington, DC 20554**

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In the matter of

The Development of Operational, Technical)
And Spectrum Requirements for Meeting Federal,)
State & Local Public Safety Agency Communications) WT Docket 96-86, FCC98-191
Requirements through the Year 2010)

To: The Commission

**Comments of Simoco International Limited in support of the APCO Petition for
Reconsideration**

Simoco International Limited (Simoco) with headquarters located in Cambridge, England is a global wireless communications equipment manufacturer, specializing in digital systems with a significant customer base of public safety organizations. Simoco is a member of the European Telecommunications Standards Institute (ETSI) community with a significant number of its 1500+ employees contributing to standard setting processes, including the inception and near completion of the Terrestrial Trunked Radio (Tetra). Simoco has committed to the Tetra family of standards, and is producing systems in accord with the Tetra specifications. Simoco has contributed to the development of Project 25 and remains actively involved in the evolution of this standard, with special emphasis on the 6.25 kHz Project 25, Phase II TDMA track. You are likely aware that Tetra has achieved 6.25 kHz equivalent channel spacing as a part of the basic specification for the common air interface (CAI). The Tetra suite of standards is the basis for digital trunked communications systems manufactured by many companies, including Motorola and Nokia who are well known in the United States. Tetra systems are in operation throughout Europe with initiatives for installations in many other parts of the world. Public safety organizations worked to create the Tetra requirement that emphasizes Interoperability, data and multiple levels of direct unit to unit communications.

Simoco has remained aware of USA current events, including the Federal Communications Commission (FCC) allocation of 24 MHz of spectrum in the band 764-776/794-806 MHz to be licensed for the exclusive use of Public Safety entities. Further, we understand that a portion of that spectrum has been assigned to interoperability, requiring digital modulation as the primary mode of communications for equipment operating in this new band of frequencies. We are also aware that the FCC is preparing to convene a new body known as the National Coordinating Council (NCC) to develop an American National Standards Institute (ANSI) certified standard within four years.

Simoco is keenly aware of the effort required to develop a standard where the work largely falls to manufacturers who have an interest in the market where resulting compliant equipment will operate. The Tetra standard was developed with many hundreds of man-years of effort required to complete the related specifications. We sense that a similar effort was required to develop the Project 25 suite of documents. That effort largely fell to manufacturers through the Telecommunications Industry Association (TIA), who contributed a 9-year body of work to produce the Project 25 suite in the TIA form, including trunking, encryption, network management and various interfaces. It is likely that many of the same

manufacturers would be called on to serve on the NCC and requested to repeat much of the work already undertaken to achieve a new CAI and Vocoder. As an ETSI charter member, Simoco is also familiar with the cost of the supporting governmental structure and process to achieve an "open" standard. ETSI continues to operate under multinational funding with a dedicated staff assigned to produce the standard, maintain the technical support library, provide meeting coordination and the management of conformance and compliance.

In light of the work completed to date, and the costs to convene and operate a new entity, Simoco encourages the FCC to reconsider the creation of a new body with a view to drawing on work already completed and either currently certified by ANSI or suitable for certification with the guidelines of 6.25 kHz equivalent channels. Portions of Project 25 have received ANSI certification with work in progress for other portions to receive such certifications. It is clear the Project 25 process has a track record of achievement that will likely lead to 6.25 kHz equivalent channel spacing in future work. Simoco and the Tetra community continue to work with the Project 25 steering committee to bring the benefits of the Tetra specification to fruition in the USA. The project forum should be considered as the mechanism to create a suitable 6.25 kHz channel efficiency digital standard. Bearing in mind the experience gained from the two major standards for Public Safety radio communications, we would strongly recommend that the FCC considers taking advantage of the experience by working through the Project 25 and TIA environment.

Simoco remains committed to the implementation of "open" standards in a multi-vendor environment for public safety communications systems and stands ready to assist the FCC to achieve that end.

Respectfully submitted,

Simoco International Limited

By:



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